

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

HON. GUY RESCHENTHALER,)	
et al.)	
)	
Plaintiffs,)	Civil No. 1:24-CV-01671
)	
v.)	The Hon. Christopher J. Conner
)	United States District Judge
AL SCHMIDT, et al.,)	
)	
Defendants.)	
)	

MOTION FOR LEAVE TO FILE COMBINED DOCUMENT

Plaintiffs allege in this case that defendants (Pennsylvania election officials) have issued directives and guidance to county boards of election regarding the eligibility of military and other overseas voters that conflicts with federal law. Proposed intervenors, the Democratic National Committee and the Pennsylvania Democratic Party, move for leave to file a combined brief in support of their motion to dismiss and response to plaintiffs' motion for a temporary restraining order and preliminary injunction of up to 30 pages. If the two documents were filed separately, each could be up to 15 pages. *See* L.R. 7.8(b). A combined document would further judicial efficiency, particularly in this highly expedited proceeding, in which oral argument is scheduled for October 18.

Pursuant to Local Rule 7.1., the undersigned contacted counsel for all parties regarding this request. Plaintiffs do not oppose this request (though without

prejudice to their opposition to the pending motion to intervene); defendants do not oppose this request.

A proposed order is attached.

October 9, 2024


WILMER CUTLER PICKERING
HALE AND DORR LLP

Seth P. Waxman
(*pro hac vice* forthcoming)
Daniel S. Volchok
(*pro hac vice* forthcoming)
Wilmer Cutler Pickering
Hale and Dorr LLP
2100 Pennsylvania Ave. N.W.
Washington, D.C. 20037
(202) 663-6000
seth.waxman@wilmerhale.com
daniel.volchok@wilmerhale.com

Nicholas Werle
(*pro hac vice* forthcoming)
Wilmer Cutler Pickering Hale and
Dorr LLP
7 World Trade Center
250 Greenwich St.
New York, New York
(212) 230-8800
nick.werle@wilmerhale.com

Respectfully submitted,

DENTONS COHEN & GRIGSBY P.C.

By: 

Clifford B. Levine
David F. Russey
Dentons Cohen & Grigsby P.C.
625 Liberty Avenue 5th Floor
Pittsburgh, Pennsylvania 15222
(412) 297-4998
clifford.levine@dentons.com
david.russey@dentons.com

CERTIFICATE OF COMPLIANCE

In accordance with Local Rule 7.1, the undersigned sought the parties' concurrence in this motion by contacting their counsel by email on October 9, 2024.

A handwritten signature in blue ink, reading "Clifford B. Levine", positioned above a horizontal line.

Clifford B. Levine

CERTIFICATE OF SERVICE

A copy of the foregoing was electronically filed on October 9, 2024, using the CM/ECF system, which will send notification of such filing to all counsel of record.

A handwritten signature in blue ink, reading "Clifford B. Levine", positioned above a horizontal line.